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Attorney for Plaintiff Riley Poor

#### The Honorable Michael H. Simon

# UNITED STATES DISTRICT COURT FOR THE DISTRICT OF OREGON

RILEY POOR,
Plaintiff,
vs.
FRONTIER AIR LINES, Inc. ,
Defendant.

No. 3:13-cv-00107-SI

JOINT MOTION FOR PROTECTIVE ORDER

## I. RULE 7-1(a)(I)(A) CERTIFICATION.

The parties have conferred pursuant to Rule 7-1(a)(I)(A) and join in this motion for a protective order.

### II. FORM OF ORDER.

The parties agree to the entry of a protective order in the form submitted herewith for the purpose of controlling the disclosure of confidential documents produced in discovery.

Respectfully submitted May 23, 2013

BRIAN T. MAYE
/s/ Brian T. Maye
Brian T. Maye (*Pro Hac Vice*)
Adler Murphy & McQuillen LLP
Of Attorneys for Defendant Frontier Air
Lines, Inc.

JAMES F. HALLEY, P.C.
/s/ James F. Halley
James F. Halley, OSB #91-175
Trial Attorney for Plaintiff Riley Poor

## CERTIFICATE OF SERVICE

I hereby certify that on May 23, 2013, I served the attached JOINT MOTION FOR PROTECTIVE ORDER on:

Brian T. Maye **ADLER MURPHY & McQUILLEN LLP**20 S. Clark, Suite 2500

Chicago, Illinois 60603

Timothy E. Miller Stuart W. Smith Miller & Associates 15005 S.W. Meadows Road, Suite 405 Lake Oswego, OR 97035

by having deposited in the United States Mail at Portland, Oregon a full, true
and correct copy in a sealed envelope with postage prepaid, addressed as shown
above, the last known address for the addressees listed;
by having hand delivered to the attorneys shown above a full, true, and
correct copy of the original.
by <u>✓</u> electronic filing.
/s James F. Halley James F. Halley, OSB #91175
The foregoing is a true, correct and complete copy of the original.
James F. Halley, OSB #91175